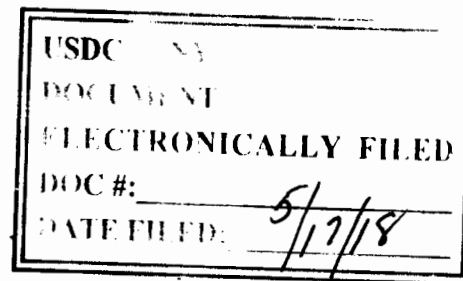




Cowan, Liebowitz & Latman, P.C.
114 West 47th Street
New York, NY 10036
(212) 790-9200 Tel
(212) 575-0671 Fax
www.cll.com

Ryan A. Ghiselli
(212) 790-9248
ryg@cll.com



May 16, 2018

VIA FAX

The Honorable Judge Victor Marrero
United States District Court, Southern District of New York
United States Courthouse
500 Pearl St.
New York, New York 10007

Re: Fong On, Inc. v. Fong On NYC, Inc. et al. 1:18-cv-02300-VM

Dear Hon. Judge Marrero:

My firm represents Defendant Mott Bulwark, LLC ("Mott Bulwark") in connection with the above-captioned matter. We write to request a 30-day extension of Mott Bulwark's May 23, 2018 deadline to answer or otherwise respond to the complaint filed by Fong On, Inc. in this action until June 22, 2018. This request is made to allow Mott Bulwark's attorneys, who were recently retained, to further investigate the matter and the potential for settlement.

Plaintiff has consented to this extension request and no prior request for an extension has been made by Mott Bulwark.

Respectfully submitted,

Ryan A. Ghiselli

cc: All counsel of record (via e-mail and mail)

31559/000/2448122

